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NEW APPLICATION

ORIGINAL

BEFORE THE
ARIZONA CORPORATION COMMISSIONCOMMISSIONERSDOUG LITTLE – CHAIRMAN
BOB STUMP
BOB BURNS
TOM FORESE
ANDY TOBIN

Arizona Corporation Commission

DOCKETED

SEP 16 2016

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AZ CORP COMMISSION
DOCKET CONTROL
2016 SEP 16 A 10:46IN THE MATTER OF THE APPLICATION)
OF I-WIRELESS, LLC TO EXPAND ITS)
ELIGIBLE TELECOMMUNICATIONS)
CARRIER SERVICE AREA)

DOCKET NO. T-20538A-_____

T-20538A-16-0324

APPLICATION OF I-WIRELESS, LLC TO EXPAND ITS ELIGIBLE
TELECOMMUNICATIONS CARRIER SERVICE AREA

i-wireless, LLC (“i-wireless” or the “Company”), pursuant to Section 214(e)(2) of the Telecommunications Act of 1996 (the “1996 Act”), 47 U.S.C. § 214(e)(2) and Federal Communications Commission (“FCC”) Universal Service Rules 47 C.F.R. §§ 54.101 through 54.207 (the “FCC Rules”), and the rules and regulations of the Arizona Corporation Commission (“Commission”), files this application to expand the Company’s Eligible Telecommunications Carrier (“ETC”) service area in the State of Arizona (“Application”).

The Commission designated i-wireless as an ETC in Decision No. 72666 (Nov. 17, 2011) (the “Designation Order”).¹ The Company has operated pursuant to this designation for over four years, offering wireless Lifeline services throughout its designated service area. Recently, however, Sprint Corporation, Virgin Mobile USA, L.P. and i-wireless reached an agreement to

¹ *In the Matter of the Application of i-wireless, LLC for Designation as an Eligible Telecommunications Carrier in the State of Arizona for the Limited Purpose of Offering Lifeline Service to Qualified Households*, Docket No. T-20538A-10-0332, Order (Nov. 17, 2011).

combine their resources in a Lifeline wireless services partnership that will respond to the FCC's vision for a modernized Lifeline program.² The venture will be launched with a transaction involving (i) the transfer of majority control of i-wireless to Sprint and (ii) the transfer of Assurance Wireless Lifeline customer accounts, currently served by Virgin Mobile to i-wireless. At this time, a significant number of Assurance Wireless customers reside in Arizona locations for which i-wireless is not designated to provide Lifeline services. In order to serve these customers, i-wireless must expand its service area.

I. I-WIRELESS'S DESIGNATED SERVICE AREA

i-wireless's current ETC service area, as originally designated, consists of the zip codes identified in **Exhibit 1**. i-wireless and Virgin Mobile use the same underlying Sprint network to serve Lifeline subscribers in Arizona. Consequently, they have the exact same network coverage available to provide wireless services in Arizona. Notwithstanding this identical coverage, however, the designated service areas of i-wireless and Virgin Mobile are not the same. The discrepancy between these service areas arises in significant part because Virgin Mobile's service area is defined by wire centers while the i-wireless service area is defined by zip codes. Wire center boundaries do not perfectly overlap with zip codes and thus, the designated service areas differ. Unfortunately, the Company has determined that there are approximately 1600 Assurance Wireless Lifeline subscribers who currently receive Lifeline services over the Sprint network from Assurance Wireless but who reside outside the currently designated service area of i-wireless. Unless the Company's service area is expanded to include the zip codes in which these Assurance Wireless subscribers reside, i-wireless will be unable to serve them. i-wireless

² The parties to this transaction have submitted a notice to the Commission providing details of the transaction and its anticipated benefits. *See, Sprint Corporation, Virgin Mobile USA, L.P. (Assurance Wireless) and i-wireless, LLC Notification Regarding Their Proposed Wireless Lifeline Services Partnership and Related Transaction*, Docket No. T-20538A-10-0332, filed Sept. 2, 2016.

therefore requests that the Commission expand its designated service area to add the additional zip codes in which these Assurance Wireless subscribers reside, which are set forth in **Exhibit 2**. Following grant of this petition, the Company's resulting (expanded) service area will include the zip codes identified in **Exhibit 3**.

Consistent with its original designation, i-wireless affirms that, to the extent a requested zip code even partially covers Federally-Recognized Tribal Lands, the Company will not provide Lifeline service to the portion of the zip code that covers Federally-Recognized Tribal Lands, whether or not they are served by Tribally-owned telecommunications carriers.

II. I-WIRELESS MEETS APPLICABLE COMMISSION REQUIREMENTS

FCC rules 47 C.F.R. §§ 54.201-54.202 (the "FCC ETC Designation Rules") set forth the information that must be contained in a petition for designation as an ETC. In its initial application for designation as an ETC, i-wireless provided all the information required by FCC ETC Designation Rules. The Commission subsequently found in its Designation Order that i-wireless met the requirements for designation as an ETC. Following its designation as an ETC in Arizona, i-wireless has complied with the conditions of the Designation Order and will continue to do so throughout the expanded service area requested in this filing.

Lifeline ETCs must be financially and technically capable of providing the supported services and FCC guidance indicates that one factor in that consideration is whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.³ i-wireless remains financially and technically capable of providing Lifeline service (and will only improve its financial and technical capabilities with its acquisition by Sprint), which it has done for four years in Arizona.

³ *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, DA 12-314 at p. 3 (Feb. 29, 2012).

i-wireless does not expect that its financial and technical ability to provide Lifeline service will be materially compromised by the Notice of Apparent Liability for Forfeiture (“NAL”) issued to i-wireless by the FCC on November 1, 2013. This misguided and unfounded NAL, which is similar to those received by a dozen other Lifeline providers, alleged that i-wireless failed to comply with FCC rules by requesting and receiving reimbursement payments from the federal Universal Service Fund for intra-company duplicate Lifeline enrollments.⁴ i-wireless has denied the allegations in the NAL and has requested that it be cancelled.

The basis for the NAL was the USAC’s in-depth validation (“IDV”) review of a sample of months in 2012 and 2013 for eight states to identify intra-company and inter-company Lifeline service duplicates.⁵ Arizona was not among the eight states reviewed.⁶ Of the subscribers included in the eight-state review, USAC claimed to have identified 1,684 intra-company duplicates during the period from October 2012 through April 2013. Even if the alleged duplicates actually were duplicates (which i-wireless disputes), i-wireless was 99.7% effective at identifying and preventing duplicate enrollments. Stated differently, only 0.26% of the total number of customers were alleged to be intra-company duplicates. This miniscule

⁴ An intra-company duplicate occurs when a consumer is provided more than one Lifeline service by a single company. The FCC has not articulated a standard for when differences in subscriber information do or do not render two subscriber accounts to be duplicates. Although i-wireless continues to use a multi-faceted approach to screening for potential duplicate enrollments, duplicates are now screened by Universal Service Administrative Company’s (“USAC’s”) National Lifeline Accountability Database (“NLAD”). i-wireless believes that the vast majority of the duplicates alleged in the NAL would have passed the duplicate screen originally incorporated into the NLAD.

⁵ An inter-company duplicate occurs when a consumer is provided Lifeline service by more than one company.

⁶ USAC conducted IDV reviews for i-wireless operations in Illinois, Indiana New York, North Carolina, Ohio, South Carolina, Tennessee and West Virginia.

alleged error rate is well within the 1.5% range deemed by Congress to be acceptable for federal benefit programs of this kind.⁷

In the nearly three years since the NAL was issued, notwithstanding recurring outreach by the Company to discuss the matter with FCC Staff, the FCC has taken no further action on the NAL. In the meantime, at least **seven** state commissions have made affirmative decisions to move forward with i-wireless' ETC designation requests, including California after a thorough review of the circumstances and status of the NAL. Each commission has been well aware of the NAL and nevertheless deemed the Company well-qualified to operate as an ETC.⁸

III. EXPANSION OF THE COMPANY'S ARIZONA ETC SERVICE AREA IS IN THE PUBLIC INTEREST

In the Designation Order, the Commission found that granting i-wireless status as an ETC in Arizona was in the public interest. Approval of the Company's Application for an expanded service area is equally so. i-wireless provides critical Lifeline services to low-income Arizona consumers throughout its service area. Upon consummation of the transaction with Sprint and Virgin Mobile, the Company will be positioned to offer materially improved service offerings to its Lifeline customers.⁹ Allowing 1600 or more Assurance Wireless customers, currently served

⁷ See Office of Management and Budget, Circular A-123, Appendix C: Requirements for Effective Estimation and Remediation of Improper Payments, 9 (Oct. 2014).

⁸ These states are: California, Georgia (expansion), Idaho, Nebraska, Oregon, Pennsylvania and Washington. California, in particular, undertook a detailed review of the allegations. Noting that the FCC "has not adopted a threshold for an acceptable level of duplicates" the Communications Division Staff concluded that 1.5% (derived from the *Federal Improper Payments Elimination and Recovery Act of 2010* (IPERA)) would be a reasonable standard and that, measured accordingly, "i-wireless' [] duplicate rate does not rise to the level of a "significant risk" that justifies a denial of their ETC designation request." California Public Utilities Commission Resolution T-17449, pp. 17-18 (Sept. 11, 2014), available at: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M107/K222/107222695.pdf>.

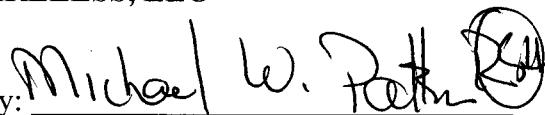
⁹ As discussed in the Company's notice to the Commission regarding the transaction, see n2 *supra*, Assurance Wireless customers that are currently receiving 350 minutes plus unlimited texts at no charge will receive 500 minutes plus unlimited texts plus 50 MB data, still at no charge, following their transfer to i-wireless. Current i-wireless customers, receiving 250 minutes plus unlimited texts at no charge, also will be migrated to the 500 minutes plus unlimited texts plus 50 MB data, still without incurring a charge.

by Virgin Mobile using the Sprint network, to smoothly transition to receive i-wireless' services, delivered over the same Sprint network, is clearly in the public interest. Expanding i-wireless' service area will enable these subscribers to enjoy a seamless transfer between providers, to continue using the same handsets, to retain the same voicemail and account access and, generally, to continue receiving Lifeline services without disruption. Wireless Lifeline service provides these subscribers with 24/7 access to emergency services as well as the ability to remain in contact with friends, family, prospective employers and social service agencies. Subscribers enjoy all the convenience and flexibility of wireless telephone service as well as the ever-at-hand security provided by a mobile phone. Grant of this application will extend those benefits not only to the Assurance Wireless subscribers identified as residing in the additional areas, but to all the other low-income Arizona citizens residing in those areas.

WHEREFORE, i-wireless respectfully requests that the Commission expeditiously grant this Application for expansion of i-wireless's ETC service area to include the additional zip codes identified herein and specifically adopt **Exhibit 3** as i-wireless's revised ETC service area in Arizona.

Respectfully submitted on this 16th day of September, 2016,

I-WIRELESS, LLC

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Exhibit 1

i-wireless, LLC
Current Arizona Designated Service Area
(in Zip Codes)

i-wireless, LLC Current Arizona Designated Service Area

Zipcode	Zip_Postal_City	Tribal Lands Covered	Zipcode	Zip_Postal_City	Tribal Lands Covered
85001	Phoenix		85043	Phoenix	
85002	Phoenix		85044	Phoenix	
85003	Phoenix		85045	Phoenix	
85004	Phoenix		85046	Phoenix	
85005	Phoenix		85048	Phoenix	
85006	Phoenix		85050	Phoenix	
85007	Phoenix		85051	Phoenix	
85008	Phoenix		85053	Phoenix	
85009	Phoenix		85054	Phoenix	
85010	Phoenix		85055	Phoenix	
85011	Phoenix		85060	Phoenix	
85012	Phoenix		85061	Phoenix	
85013	Phoenix		85062	Phoenix	
85014	Phoenix		85063	Phoenix	
85015	Phoenix		85064	Phoenix	
85016	Phoenix		85065	Phoenix	
85017	Phoenix		85066	Phoenix	
85018	Phoenix		85067	Phoenix	
85019	Phoenix		85068	Phoenix	
85020	Phoenix		85069	Phoenix	
85021	Phoenix		85070	Laveen	
85022	Phoenix		85071	Phoenix	
85023	Phoenix		85072	Phoenix	
85024	Phoenix		85074	Phoenix	
85025	Phoenix		85075	Phoenix	
85026	Phoenix		85076	Phoenix	
85027	Phoenix		85078	Phoenix	
85028	Phoenix		85079	Phoenix	
85029	Phoenix		85080	Phoenix	
85030	Phoenix		85082	Phoenix	
85031	Phoenix		85083	Phoenix	
85032	Phoenix		85085	Phoenix	
85033	Phoenix		85086	Phoenix	
85034	Phoenix		85087	New River	
85035	Phoenix		85096	Phoenix	
85036	Phoenix		85097	Phoenix	
85037	Phoenix		85098	Phoenix	
85038	Phoenix		85099	Phoenix	
85040	Phoenix		85117	Apache Junction	
85041	Phoenix		85118	Apache Junction	
85042	Phoenix		85119	Apache Junction	

i-wireless, LLC Current Arizona Designated Service Area

Zipcode	Zip_Postal_City	Tribal Lands Covered	Zipcode	Zip_Postal_City	Tribal Lands Covered
85120	Apache Junction		85209	Mesa	
85121	Chandler	Gila River Telecomm, Inc.	85210	Mesa	
85122	Casa Grande		85211	Mesa	
85123	Arizona City		85212	Mesa	
85127	Queen Creek		85213	Mesa	
85128	Coolidge	Gila River Telecomm, Inc.	85214	Mesa	
85130	Casa Grande		85215	Mesa	
85131	Eloy		85216	Mesa	
85132	Florence		85217	Apache Junction	
85138	Maricopa		85218	Apache Junction	
85139	Maricopa		85219	Apache Junction	
85140	Queen Creek		85220	Apache Junction	
85141	Eloy		85221	Casa Grande	
85142	Queen Creek		85222	Casa Grande	Tohono O'odham Utility Authority
85143	Queen Creek		85223	Eloy	
85145	Red Rock		85224	Chandler	
85147	Chandler	Gila River Telecomm, Inc.	85225	Chandler	
85172	Stanfield		85226	Chandler	Gila River Telecomm, Inc.
85178	Apache Junction		85227	Queen Creek	
85190	Apache Junction		85228	Coolidge	
85191	Coolidge		85230	Casa Grande	Tohono O'odham Utility Authority
85193	Casa Grande		85231	Eloy	
85194	Casa Grande		85232	Florence	
85201	Mesa		85233	Gilbert	
85202	Mesa		85234	Gilbert	
85203	Mesa		85236	Higley	
85204	Mesa		85238	Maricopa	
85205	Mesa		85239	Maricopa	
85206	Mesa		85240	Queen Creek	
85207	Mesa		85241	Eloy	
85208	Mesa		85242	Queen Creek	

i-wireless, LLC Current Arizona Designated Service Area

Zipcode	Zip_Postal_City	Tribal Lands Covered	Zipcode	Zip_Postal_City	Tribal Lands Covered
85243	Queen Creek		85291	Coolidge	
85244	Chandler		85293	Casa Grande	
85245	Red Rock		85294	Casa Grande	
85246	Chandler		85295	Gilbert	
85247	Chandler		85296	Gilbert	
85248	Chandler	Gila River Telecomm, Inc.	85297	Gilbert	
85249	Chandler		85298	Gilbert	
85250	Scottsdale		85299	Gilbert	
85251	Scottsdale		85301	Glendale	
85252	Scottsdale		85302	Glendale	
85253	Paradise Valley		85303	Glendale	
85254	Scottsdale		85304	Glendale	
85255	Scottsdale		85305	Glendale	
85256	Scottsdale		85306	Glendale	
85257	Scottsdale		85307	Glendale	
85258	Scottsdale		85308	Glendale	
85259	Scottsdale		85309	Luke AFB	
85260	Scottsdale		85310	Glendale	
85261	Scottsdale		85311	Glendale	
85263	Rio Verde		85312	Glendale	
85266	Scottsdale		85318	Glendale	
85267	Scottsdale		85322	Arlington	
85268	Fountain Hills		85323	Avondale	
85269	Fountain Hills		85326	Buckeye	
85271	Scottsdale		85327	Cave Creek	
85272	Stanfield		85328	Cibola	
85274	Mesa		85329	Avondale	
85275	Mesa		85331	Cave Creek	
85277	Mesa		85333	Dateland	
85278	Apache Junction		85334	Cibola	
85280	Tempe		85335	El Mirage	
85281	Tempe		85336	Somerton	
85282	Tempe		85337	Gila Bend	
85283	Tempe		85338	Goodyear	
85284	Tempe		85339	Laveen	Gila River Telecomm, Inc.
85285	Tempe		85340	Litchfield Park	
85286	Chandler		85342	Morristown	
85287	Tempe		85343	Palo Verde	

i-wireless, LLC Current Arizona Designated Service Area

Zipcode	Zip_Postal_City	Tribal Lands Covered	Zipcode	Zip_Postal_City	Tribal Lands Covered
85345	Peoria		85532	Miami	Gila River Telecomm, Inc.
85346	Parker		85547	Payson	
85349	Somerton		85553	Payson	
85350	Somerton		85603	Bisbee	
85351	Sun City		85605	San Simon	
85352	Wellton		85606	Cochise	
85353	Tolleson		85608	Douglas	
85354	Tonopah		85609	Cochise	
85355	Waddell		85613	Fort Huachuca	
85358	Wickenburg		85614	Green Valley	
85359	Parker		85616	Huachuca City	
85360	Lake Havasu City		85617	MC Neal	
85361	Wittmann		85618	Mammoth	
85363	Youngtown		85619	Mount Lemmon	
85364	Yuma		85620	Bisbee	
85365	Yuma		85622	Green Valley	
85366	Yuma		85623	Oracle	
85367	Yuma		85626	Douglas	
85369	Yuma		85627	Benson	
85372	Sun City		85628	Nogales	
85373	Sun City		85629	Sahuarita	
85374	Surprise		85630	Saint David	
85375	Sun City West		85631	San Manuel	
85376	Sun City West		85632	San Simon	
85377	Cave Creek		85635	Sierra Vista	
85378	Surprise		85636	Sierra Vista	
85379	Surprise		85640	Tumacacori	
85380	Peoria		85641	Vail	
85381	Peoria		85644	Willcox	
85382	Peoria		85645	Amado	
85383	Peoria		85646	Tumacacori	
85385	Peoria		85648	Rio Rico	
85387	Surprise		85650	Sierra Vista	
85388	Surprise		85652	Tucson	
85392	Avondale		85653	Marana	
85395	Goodyear		85654	Marana	
85396	Buckeye		85655	Douglas	
85502	Globe		85658	Marana	

i-wireless, LLC Current Arizona Designated Service Area

Zipcode	Zip_Postal_City	Tribal Lands Covered	Zipcode	Zip_Postal_City	Tribal Lands Covered
85662	Nogales		85734	Tucson	
85670	Sierra Vista		85735	Tucson	
85701	Tucson		85737	Tucson	
85702	Tucson		85738	Tucson	
85703	Tucson		85739	Tucson	
85704	Tucson		85740	Tucson	
85705	Tucson		85741	Tucson	
85706	Tucson		85742	Tucson	
85707	Tucson		85743	Tucson	
85708	Tucson		85744	Tucson	
85709	Tucson		85745	Tucson	
85710	Tucson		85746	Tucson	
85711	Tucson		85747	Tucson	
85712	Tucson		85748	Tucson	
85713	Tucson		85749	Tucson	
85714	Tucson		85750	Tucson	
85715	Tucson		85751	Tucson	
85716	Tucson		85752	Tucson	
85717	Tucson		85754	Tucson	
85718	Tucson		85755	Tucson	
85719	Tucson		85756	Tucson	
85721	Tucson		85757	Tucson	
85722	Tucson		85942	Holbrook	
85723	Tucson		86002	Flagstaff	
85724	Tucson		86003	Flagstaff	
85725	Tucson		86004	Flagstaff	Frontier/Navajo
85726	Tucson		86011	Flagstaff	
85728	Tucson		86015	Flagstaff	
85730	Tucson		86017	Flagstaff	
85731	Tucson		86018	Williams	
85732	Tucson		86023	Williams	
85733	Tucson		86025	Holbrook	

i-wireless, LLC Current Arizona Designated Service Area

Zipcode	Zip_Postal_City	Tribal Lands Covered		Zipcode	Zip_Postal_City	Tribal Lands Covered
86028	Holbrook			86342	Rimrock	
86029	Holbrook			86351	Sedona	
86032	Winslow			86402	Kingman	
86301	Prescott			86403	Lake Havasu City	
86302	Prescott			86404	Lake Havasu City	
86304	Prescott			86405	Lake Havasu City	
86312	Prescott Valley			86409	Kingman	
86313	Prescott			86412	Kingman	
86314	Prescott Valley			86413	Golden Valley	
86315	Prescott Valley			86426	Fort Mohave	Fort Mohave Telecomm, Inc.
86320	Ash Fork			86427	Fort Mohave	Fort Mohave Telecomm, Inc.
86322	Camp Verde			86429	Bullhead City	
86325	Cornville			86430	Bullhead City	
86326	Cottonwood			86431	Kingman	
86327	Dewey			86436	Topock	
86329	Dewey			86438	Bullhead City	
86330	Prescott			86439	Bullhead City	
86331	Clarkdale			86440	Mohave Valley	Fort Mohave Telecomm, Inc.
86333	Mayer			86446	Bullhead City	
86335	Rimrock			86506	Ganado	Table Top Tel Company, Inc.
86339	Sedona			86511	Ganado	
86340	Sedona			86512	Chambers	Table Top Tel Company, Inc.
86341	Sedona			86555	Douglas	

Exhibit 2

i-wireless, LLC
Requested Additional Arizona Service Area
(in Zip Codes)

Zip	City	County	Zip	City	County
85039	Phoenix	Maricopa	85671	Sierra Vista	Cochise
85073	Phoenix	Maricopa	85720	Tucson	Pima
85137	Kearny	Pinal County	85736	Tucson	Pima County
85147**	Sacaton	Pinal	85775	Tucson	Pima
85173	Superior	Pinal County	85937	Snowflake	Navajo County
85262	Scottsdale	Maricopa	86001	Flagstaff	Coconino County
85324	Black Canyon City	Yavapai	86024	Grand Canyon	Coconino County
85332	Congress	Yavapai County	86046	Williams	Coconino County
85347	Roll	Yuma	86303	Prescott	Yavapai
85348	Salome	La Paz County	86305	Prescott	Yavapai County
85356	Wellton	Yuma	86323	Chino Valley	Yavapai
85390	Wickenburg	Maricopa County	86324	Clarkdale	Yavapai
85501	Globe	Gila	86334	Paulden	Yavapai County
85539	Miami	Gila County	86336	Sedona	Yavapai County
85541	Payson	Gila	86337	Seligman	Yavapai County
85544	Pine	Gila	86343	Crown King	Yavapai County
85546	Pine	Graham County	86401	Kingman	Mohave
85602	Benson	Cochise	86406	Lake Havasu City	Mohave County
85607	Douglas	Cochise	86411	Hackberry	Mohave
85611	Dragoon	Santa Cruz County	86432	Littlefield	Mohave County
85615	Hereford	Cochise	86441	Dolan Springs	Mohave
85621	Nogales	Santa Cruz	86442	Bullhead City	Mohave
85637	Sonoita	Pima County	86445	Willow Beach	Mohave
85638	Tombstone	Cochise	86502**	Chambers	Apache
85643	Willcox	Cochise			

**** Zip code partially or fully covers tribal lands.**

Exhibit 3

i-wireless, LLC

**Proposed Consolidated Arizona Service Area
(in Zip Codes)**

i-wireless, LLC Proposed Consolidated Arizona Service Area

Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City
85001	Phoenix	85036	Phoenix	85079	Phoenix
85002	Phoenix	85037	Phoenix	85080	Phoenix
85003	Phoenix	85038	Phoenix	85082	Phoenix
85004	Phoenix	85039	Phoenix	85083	Phoenix
85005	Phoenix	85040	Phoenix	85085	Phoenix
85006	Phoenix	85041	Phoenix	85086	Phoenix
85007	Phoenix	85042	Phoenix	85087	New River
85008	Phoenix	85043	Phoenix	85096	Phoenix
85009	Phoenix	85044	Phoenix	85097	Phoenix
85010	Phoenix	85045	Phoenix	85098	Phoenix
85011	Phoenix	85046	Phoenix	85099	Phoenix
85012	Phoenix	85048	Phoenix	85117	Apache Junction
85013	Phoenix	85050	Phoenix	85118	Apache Junction
85014	Phoenix	85051	Phoenix	85119	Apache Junction
85015	Phoenix	85053	Phoenix	85120	Apache Junction
85016	Phoenix	85054	Phoenix	85121	Chandler
85017	Phoenix	85055	Phoenix	85122	Casa Grande
85018	Phoenix	85060	Phoenix	85123	Arizona City
85019	Phoenix	85061	Phoenix	85127	Queen Creek
85020	Phoenix	85062	Phoenix	85128	Coolidge
85021	Phoenix	85063	Phoenix	85130	Casa Grande
85022	Phoenix	85064	Phoenix	85131	Eloy
85023	Phoenix	85065	Phoenix	85132	Florence
85024	Phoenix	85066	Phoenix	85137	Kearny
85025	Phoenix	85067	Phoenix	85138	Maricopa
85026	Phoenix	85068	Phoenix	85139	Maricopa
85027	Phoenix	85069	Phoenix	85140	Queen Creek
85028	Phoenix	85070	Laveen	85141	Eloy
85029	Phoenix	85071	Phoenix	85142	Queen Creek
85030	Phoenix	85072	Phoenix	85143	Queen Creek
85031	Phoenix	85073	Phoenix	85145	Red Rock
85032	Phoenix	85074	Phoenix	85147	Chandler
85033	Phoenix	85075	Phoenix	85147	Sacaton
85034	Phoenix	85076	Phoenix	85172	Stanfield
85035	Phoenix	85078	Phoenix	85173	Superior

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Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City
85178	Apache Junction	85232	Florence	85272	Stanfield
85190	Apache Junction	85233	Gilbert	85274	Mesa
85191	Coolidge	85234	Gilbert	85275	Mesa
85193	Casa Grande	85236	Higley	85277	Mesa
85194	Casa Grande	85238	Maricopa	85278	Apache Junction
85201	Mesa	85239	Maricopa	85280	Tempe
85202	Mesa	85240	Queen Creek	85281	Tempe
85203	Mesa	85241	Eloy	85282	Tempe
85204	Mesa	85242	Queen Creek	85283	Tempe
85205	Mesa	85243	Queen Creek	85284	Tempe
85206	Mesa	85244	Chandler	85285	Tempe
85207	Mesa	85245	Red Rock	85286	Chandler
85208	Mesa	85246	Chandler	85287	Tempe
85209	Mesa	85247	Chandler	85291	Coolidge
85210	Mesa	85248	Chandler	85293	Casa Grande
85211	Mesa	85249	Chandler	85294	Casa Grande
85212	Mesa	85250	Scottsdale	85295	Gilbert
85213	Mesa	85251	Scottsdale	85296	Gilbert
85214	Mesa	85252	Scottsdale	85297	Gilbert
85215	Mesa	85253	Paradise Valley	85298	Gilbert
85216	Mesa	85254	Scottsdale	85299	Gilbert
85217	Apache Junction	85255	Scottsdale	85301	Glendale
85218	Apache Junction	85256	Scottsdale	85302	Glendale
85219	Apache Junction	85257	Scottsdale	85303	Glendale
85220	Apache Junction	85258	Scottsdale	85304	Glendale
85221	Casa Grande	85259	Scottsdale	85305	Glendale
85222	Casa Grande	85260	Scottsdale	85306	Glendale
85223	Eloy	85261	Scottsdale	85307	Glendale
85224	Chandler	85262	Scottsdale	85308	Glendale
85225	Chandler	85263	Rio Verde	85309	Luke AFB
85226	Chandler	85266	Scottsdale	85310	Glendale
85227	Queen Creek	85267	Scottsdale	85311	Glendale
85228	Coolidge	85268	Fountain Hills	85312	Glendale
85230	Casa Grande	85269	Fountain Hills	85318	Glendale
85231	Eloy	85271	Scottsdale	85322	Arlington

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Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City
85323	Avondale	85364	Yuma	85605	San Simon
85324	Black Canyon City	85365	Yuma	85606	Cochise
85326	Buckeye	85366	Yuma	85607	Douglas
85327	Cave Creek	85367	Yuma	85608	Douglas
85328	Cibola	85369	Yuma	85609	Cochise
85329	Avondale	85372	Sun City	85611	Dragoon
85331	Cave Creek	85373	Sun City	85613	Fort Huachuca
85332	Cave Creek	85374	Surprise	85614	Green Valley
85333	Dateland	85375	Sun City West	85615	Hereford
85334	Cibola	85376	Sun City West	85616	Huachuca City
85335	El Mirage	85377	Cave Creek	85617	MC Neal
85336	Somerton	85378	Surprise	85618	Mammoth
85337	Gila Bend	85379	Surprise	85619	Mount Lemmon
85338	Goodyear	85380	Peoria	85620	Bisbee
85339	Laveen	85381	Peoria	85621	Nogales
85340	Litchfield Park	85382	Peoria	85622	Green Valley
85342	Morristown	85383	Peoria	85623	Oracle
85343	Palo Verde	85385	Peoria	85626	Douglas
85345	Peoria	85387	Surprise	85627	Benson
85346	Parker	85388	Surprise	85628	Nogales
85347	Roll	85390	Wickenburg	85629	Sahuarita
85348	Salome	85392	Avondale	85630	Saint David
85349	Somerton	85395	Goodyear	85631	San Manuel
85350	Somerton	85396	Buckeye	85632	San Simon
85351	Sun City	85501	Globe	85635	Sierra Vista
85352	Wellton	85502	Globe	85636	Sierra Vista
85353	Tolleson	85532	Miami	85637	Sonoita
85354	Tonopah	85539	Miami	85638	Tombstone
85355	Waddell	85541	Payson	85640	Tumacacori
85356	Wellton	85544	Pine	85641	Vail
85358	Wickenburg	85546	Pine	85643	Willcox
85359	Parker	85547	Payson	85644	Willcox
85360	Lake Havasu City	85553	Payson	85645	Amado
85361	Wittmann	85602	Benson	85646	Tumacacori
85363	Youngtown	85603	Bisbee	85648	Rio Rico

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Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City	Zipcode	Zip_Postal_City
85650	Sierra Vista	85728	Tucson	86011	Flagstaff
85652	Tucson	85730	Tucson	86015	Flagstaff
85653	Marana	85731	Tucson	86017	Flagstaff
85654	Marana	85732	Tucson	86018	Williams
85655	Douglas	85733	Tucson	86023	Williams
85658	Marana	85734	Tucson	86024	Grand Canyon
85662	Nogales	85735	Tucson	86025	Holbrook
85670	Sierra Vista	85736	Tucson	86028	Holbrook
85671	Sierra Vista	85737	Tucson	86029	Holbrook
85701	Tucson	85738	Tucson	86032	Winslow
85702	Tucson	85739	Tucson	86046	Williams
85703	Tucson	85740	Tucson	86301	Prescott
85704	Tucson	85741	Tucson	86302	Prescott
85705	Tucson	85742	Tucson	86303	Prescott
85706	Tucson	85743	Tucson	86304	Prescott
85707	Tucson	85744	Tucson	86305	Prescott
85708	Tucson	85745	Tucson	86312	Prescott Valley
85709	Tucson	85746	Tucson	86313	Prescott
85710	Tucson	85747	Tucson	86314	Prescott Valley
85711	Tucson	85748	Tucson	86315	Prescott Valley
85712	Tucson	85749	Tucson	86320	Ash Fork
85713	Tucson	85750	Tucson	86322	Camp Verde
85714	Tucson	85751	Tucson	86323	Chino Valley
85715	Tucson	85752	Tucson	86324	Clarkdale
85716	Tucson	85754	Tucson	86325	Cornville
85717	Tucson	85755	Tucson	86326	Cottonwood
85718	Tucson	85756	Tucson	86327	Dewey
85719	Tucson	85757	Tucson	86329	Dewey
85720	Tucson	85775	Tucson	86330	Prescott
85721	Tucson	85937	Snowflake	86331	Clarkdale
85722	Tucson	85942	Holbrook	86333	Mayer
85723	Tucson	86001	Flagstaff	86334	Paulden
85724	Tucson	86002	Flagstaff	86335	Rimrock
85725	Tucson	86003	Flagstaff	86336	Sedona
85726	Tucson	86004	Flagstaff	86337	Sedona

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Zipcode	Zip_Postal_City
86339	Sedona
86340	Sedona
86341	Sedona
86342	Rimrock
86343	Crown King
86351	Sedona
86401	Kingman
86402	Kingman
86403	Lake Havasu City
86404	Lake Havasu City
86405	Lake Havasu City
86406	Lake Havasu City
86409	Kingman
86411	Hackberry
86412	Kingman
86413	Golden Valley
86426	Fort Mohave
86427	Fort Mohave
86429	Bullhead City
86430	Bullhead City
86431	Kingman
86432	Littlefield
86436	Topock
86438	Bullhead City
86439	Bullhead City
86440	Mohave Valley
86441	Dolan Springs
86442	Bullhead City
86445	Willow Beach
86446	Bullhead City
86502	Chambers
86506	Ganado
86511	Ganado
86512	Chambers
86555	Douglas